

## UNITED STATES DISTRICT COURT

FILED

for the  
Eastern District of Missouri

FEB 13 2015

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

## In the Matter of the Search of

Two (2) blue in color, Rubbermaid Roughneck brand, 50 gallon plastic bins; one (1) blue in color, Sterilite brand, 35 gallon plastic bin; and two (2) grey in color, Sterilite brand, 50 gallon plastic bins, located in the Federal Bureau of Investigation, St. Louis Field Office, 2222 Market Street, St. Louis, Missouri, 63103.

Case No. 4: 15 MJ 43 DDN

## APPLICATION FOR A SEARCH WARRANT

I, Kevin Cosentino, a federal law enforcement officer or an attorney for the government request a search warrant and state under penalty of perjury that I have reason to believe that on the following property:  
Two (2) blue in color, Rubbermaid Roughneck brand, 50 gallon plastic bins; one (1) blue in color, Sterilite brand, 35 gallon plastic bin; and two (2) grey in color, Sterilite brand, 50 gallon plastic bins, located in the Federal Bureau of Investigation, St. Louis Field Office, 2222 Market Street, St. Louis, Missouri, 63103.

located in the EASTERN District of MISSOURI, there is now concealed

See Attachment A.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

## Code Section

## Offense Description

18 U.S.C. Section 2339A  
 18 U.S.C. Section 956 & 2

Conspiracy to provide material support to terrorists  
 Conspiracy to kill and mane persons in a foreign country

The application is based on these facts:

SEE ATTACHED AFFIDAVIT WHICH IS INCORPORATED HEREIN BY REFERENCE

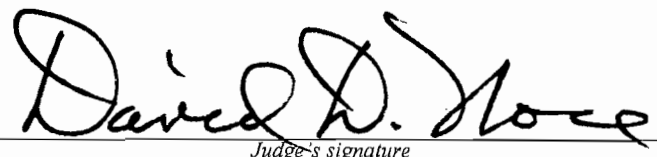
- ☒ Continued on the attached sheet.  
☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature  
 Special Agent Kevin Cosentino  
 Federal Bureau of Investigation

Printed name and title

Sworn to before me and signed in my presence.

Date: Feb. 13, 2015


Judge's signature

City and state: St. Louis, MO

Honorable David D. Noce, U.S. Magistrate Judge  
 Printed name and title

AUSA: Howard J. Marcus

## **AFFIDAVIT IN SUPPORT OF SEARCH WARRANT**

### **I. INTRODUCTION**

I, KEVIN COSENTINO, being duly sworn, state as follows:

#### **A. Affiant Background**

1. I am a Special Agent commissioned by the Federal Bureau of Investigation, (FBI) of the United States Department of Justice, currently assigned to the St. Louis, Missouri Division. I have been employed by the FBI for approximately twenty three years. I graduated from of the Federal Bureau of Investigation academy. I am responsible for, among other assignments, conducting investigations of alleged criminal violations and Title 18 offenses including matters related to national security. During the course of my law enforcement experience I have participated in several complex investigations, specializing in white collar fraud and international terrorism matters. I regularly work with a team of agents and task force officers who are focused on investigating crimes related to international terrorism.

2. I am familiar with and have used normal methods of investigation, including, but not limited to, visual surveillance, questioning witnesses, the use of search and arrest warrants, the use of informants, and the use of court authorized electronic surveillance. I am participating in the investigation described herein as a Special Agent with the Federal Bureau of Investigation and as part of a team investigating the matters identified herein. The investigative team is presently conducting an investigation of possible violations of federal statutes, including but not limited to national security and terrorism matters. The violations being investigated include:

(a) Title 18, United States Code, Section 956 (Conspiracy to murder, kidnap or maim, persons in a foreign country);

(b) Title 18, United States Code, Section 2339A (Providing material support or

resources to terrorists)

3. The information contained within this affidavit is either personally known by me or was provided to me by other Agents or law enforcement personnel involved in the investigation of the incidents described. I have discussed the matters herein with the other Agents working on the investigation, read reports, and otherwise reviewed materials assimilated during the investigation. Because this affidavit is being submitted for the limited purpose of securing search warrants, I have not included each and every fact known to me concerning this investigation I have also set forth only the facts that I believe are necessary to establish probable cause to believe that the items to be seized, described on Attachment A are presently found in Two (2) blue in color, Rubbermaid Roughneck brand, 50 gallon plastic bins; one (1) blue in color, Sterilite brand, 35 gallon plastic bin; and two (2) grey in color, Sterilite brand, 50 gallon plastic bins, located in the Federal Bureau of Investigation, St. Louis Field Office, 2222 Market Street, St. Louis, Missouri, 63103.

4. I have participated in this investigation as a member of a team of investigators and law enforcement personnel from the FBI, St. Louis Metropolitan Police Department, Department of Homeland Security-Immigration and Customs Enforcement, U.S. Postal Inspection Service and other agencies. The information used to support the factual representations herein comes from a variety of sources, including records obtained by grand jury subpoenas, interviews, a review of materials from a variety of "open source" and publically available information. Some references made in this affidavit are based in part on the investigative team's review of summaries that were translated from foreign languages into English by trained linguists.

**B. Jurisdiction**

5. This Court has jurisdiction to issue the requested warrant because it is "a court of

Competent jurisdiction" as defined by 18 U.S.C §2711. 18 U.S.C. §§2703(a),(b)(1)(A) & (c)(1)(A). Specifically, the Court is a "district court of the United States ... that- has jurisdiction over the offense being investigated." 18 U.S. C. § 2711(3)(A)(i).

## **II. LOCATION TO BE SEARCHED**

A. Two (2) blue in color, Rubbermaid Roughneck brand, 50 gallon plastic bins; one (1) blue in color, Sterilite brand, 35 gallon plastic bin; and two (2) grey in color, Sterilite brand, 50 gallon plastic bins, located in the Federal Bureau of Investigation, St. Louis Field Office, 2222 Market Street, St. Louis, Missouri, 63103.

## **III. BACKGROUND OF THE INVESTIGATION**

6. I am participating in the investigation described herein as a Special Agent with the Federal Bureau of Investigation and as part of a team investigating the matters identified herein. The team has determined that individuals from the United States and the Eastern District of Missouri appear to have travelled or attempted to travel abroad to Syria to participate in violent activities including killing and injuring other persons and damaging property abroad. Some individuals are acting as "foreign fighters," insurgents, and/or militants in the ongoing conflict in Syria. Moreover, other persons who remain here in the United States and the Eastern District of Missouri and elsewhere are believed to be actively and knowingly supplying the persons who travelled abroad as well as their causes. Support and resources to include financial assistance as well as providing means of communication, equipment, clothing, and gear to those involved in violence abroad.

7. This affidavit contains information that is based upon my training, experience and my investigation as well as the training, experience and investigation of other agents. This affidavit does not contain each and every fact known to me or other investigators but sets forth

only what is necessary to establish probable cause. As part of this investigation, agents have reviewed a large amount of materials and communications, the majority of it in Bosnian or other languages. However trained FBI linguists have translated this material for the agents.

8. Based upon the information set forth below, there is probable cause to believe that Ramiz Zijad Hodzic (Ramiz) and Sedina Unkcic Hodzic (Sedina) and others have committed federal criminal violations including conspiracy to provide material support in violation of Title 18 United States Code Section 2339A; and conspiracy to maim and kill in a foreign country in violation of Title 18 United States Code, Section 956. Further there is probable cause to believe that there is evidence of those crimes, contraband, fruits of a crime, illegally possessed items, property designated for use, intended for use or used in committing a crime will be found in the Two (2) blue in color, Rubbermaid Roughneck brand, 50 gallon plastic bins; one (1) blue in color, Sterilite brand, 35 gallon plastic bin; and two (2) grey in color, Sterilite brand, 50 gallon plastic bins, located in the Federal Bureau of Investigation, St. Louis Field Office, 2222 Market Street, St. Louis, Missouri, 63103.

9. In this affidavit I refer to conversations between subjects. Unless designated otherwise, these conversations occurred via Facebook. In this affidavit I frequently use the term "brother" or "brothers". Based upon my training and experience as well as the trained FBI linguists, the term "brothers" denotes Muslim fighters who are fighting in Syria. Further when I use the term "brother", I am specifically referring to Abdullah Ramo Pazara.

#### **V. FACTS AND CIRCUMSTANCES**

10. On February 5, 2015, a Federal Grand Jury in the Eastern District of Missouri returned an indictment and found probable cause that Ramiz, Sedina and others violated Title 18, U.S.C. §2339A and that Ramiz, and others violated Title 18, U.S.C. §956.



11. On or about August 17, 2013, a subject known as Haris Harcevic (Haris) attempted to re-enter the United States via Washington Dulles International Airport. At that time, Customs and Border Patrol referred Haris for a secondary interview and inspection. Through this interview with Haris, agents determined that Haris, a naturalized United States citizen, and a subject known as Ramo Pazara (Pazara) travelled from the United States on May 28, 2013 and flew together to Croatia. Haris told agents he believed Pazara went onto Teslic, Bosnia, while separately Haris visited Bihac and Sarajevo, Bosnia. Haris said he remained in Bosnia until July 3, 2013, when he traveled to Istanbul, Turkey for approximately 10 days for "religious purposes." After Istanbul, Haris told agents he returned to Bosnia until his flight departed from Slovenia. Haris told agents he had paid for this trip to Bosnia with cash money he had earned while working in St. Louis. Subsequent business records checks of Haris' banking institutions and flight records indicated Haris purchased both his and Pazara's airline tickets.

12. On or about August 30, 2013, investigators interviewed an individual identified herein as "John Doe", whose identity is known to the agents and who informed investigators that an individual named Nihad Rosic (Rosic) and Pazara were originally planning to travel together to Syria. However, Rosic was arrested on local charges and incarcerated. "John Doe" explained that, as a result of Rosic's incarceration, Pazara departed without Rosic and was believed to be in Syria at that time. Pazara reportedly flew to Sarajevo and then was transported to Syria.

13. Based upon that incident, agents began an investigation into Pazara. Agents determined that Pazara came to the United States from Teslic, Bosnia as a refugee in 2000. Pazara ultimately settled in St. Louis, Missouri. On May 17, 2013, Pazara was naturalized as a United States citizen. That same day, Pazara completed an Application for a U.S. passport. Approximately 11 days later, Pazara left the country with Haris to travel to Croatia and

ultimately to Syria. Through their investigation, including the review of Pazara's public Facebook information, agents determined that Pazara arrived in Syria in July 2013 and began fighting with and engaging in combat and insurgency operations in Syria and Iraq.

14. Agents determined that Pazara's last known residence in the United States was 5091 Clayridge Drive in St. Louis, Missouri. Agents reviewed the leasing agreement for 5091 Clayridge and determined that Pazara rented the residence. As part of the lease application, Pazara listed Ramiz, as a reference and listed Ramiz Zijad Hodzic's (Ramiz) cell phone number, 314-494-1342 and an address of 1190 Calley Dr #C, St. Louis, MO 63125. Records checks indicated Ramiz previously resided at 1190 Calley Dr #C, St. Louis, MO 63125 and presently resides at 4328 Chateau De Ville, St. Louis, MO 63129.

15. Early into the investigation of Pazara, it was determined he maintained a Facebook account. From a review of Pazara's page, Agents learned he was *Facebook Friends* with both Ramiz and Sedina Unkic Hodzic (Sedina). Facebook was utilized as a primary means of communications between the conspirators. The bulk of the evidence reviewed by agents comes partially from public Facebook pages and from materials obtained through a search warrant issued by United States Magistrate Judge David D. Noce in May, 2014 for the Facebook accounts of Ramiz and Pazara. Facebook provided voluminous materials comprising the contents of the accounts to include private messages, conversations, photographs, internet links, and posts made to the accounts by users and friends. The material obtained from the search warrant revealed the manner and means of the conspiracy, identified conspirators knowledge and intent, conspirator's roles and actions taken in furtherance of the conspiracy. It is clear from this evidence that the conspirators knew that Pazara and others were engaging in combat and committing acts of murder and violence in Syria and Iraq.

16. Based upon a review of the Face book materials, agents determined that between July, 2013, and September, 2014, Pazara was engaged in combat and insurgency in Syria and Iraq. Pazara started out as a foot soldier in July, 2013. He fought with Bosnians, Chechens, and Germans and gradually gathered a large group of fighters of Balkan origins. Pazara ultimately obtained the title of *Emir* as a military commander of numerous fighters engaged in combat in Syria and Iraq. Agents have reviewed open source materials which indicate Pazara was killed in combat in September, 2014.

17. Through records obtained from Facebook, agents determined that Ramiz and Sedina organized a network of subjects who were providing material support to Pazara and other foreign fighters and insurgents in Syria and Iraq.

18. Since arriving in Syria, Pazara used a series of Facebook accounts to communicate with other conspirators in the United States and in other countries. He regularly identified himself as being in Syria and Iraq and engaged in combat.

19. In addition to Ramiz and Sedina, Pazara's supporters included: Mediha Medy Salkicevic (Salkicevic) a naturalized United States citizen from Teslic, Bosnia and a resident of Schiller Park, Illinois. Armin Harcevic (Armin), a Bosnian refugee who has resided in St. Louis, Missouri and California; Nihad Rosic (Rosic), a Bosnian refugee and a naturalized United States citizen residing in the Albany, New York area; and Jasminka Ramic (Jasminka), a Bosnian refugee and a naturalized United States citizen who resided in the Rockford, Illinois area and has temporary relocated to Federal Republic of Germany.

20. In July, 2013, Pazara conversed with Ramiz and told him that Pazara was with Chechen brothers. Ramiz prayed that Allah make Pazara stronger and to punish the forsaken dog with Pazara's hands. Pazara also inquired about obtaining *optics* and boots. I know that based



upon my training and experience as well as my investigation, an optic is a rifle scope. Pazara told Ramiz that he had a person in Turkey where the optics and boots could be sent. I know that based upon my training and experience that Turkey shares a common border with Syria. Further, items or funds can be easily sent to Turkey and then transported across the border to foreign fighters and insurgents in Syria. Trusted Turkish citizens who are sympathetic to their cause would receive the items and bring them to the Syrian border. These trusted sympathizers would turn over the items to foreign fighters and insurgents and would receive payment for their time and expenses. Ramiz agreed to obtain these items for Pazara and began the process of funding.

21. Beginning in August, 2013, Ramiz and Salkicevic agreed to contribute funds for Pazara and the brothers who were actively fighting in Syria. Ramiz told Salkicevic that "the Bosnian brothers" in Syria needed boots and uniform. Salkicevic agreed to contribute funds and Ramiz sent her a photo of Pazara pointing a pistol. Ramiz identified the photo as the St. Louis person who was fighting in Syria. Salkicevic responded that she was happy that Pazara and other brothers responded to the call of jihad. Salkicevic immediately began to contact her friends and associates, using online social media as a main way of soliciting funds.

22. Ramiz and Salkicevic then began the task of obtaining money. Ramiz told Salkicevic that it would cost \$500 to equip two fighters. Salkicevic told Ramiz that if she couldn't go to Syria herself, she would participate in other ways.

23. Pazara told Ramiz that he needed boots and uniforms for five others. On August 5, 2013, Ramiz advised Pazara that he had obtained the boots and uniforms and sent Pazara photographs of the purchases.

24. Salkicevic and Ramiz arranged for Salkicevic to send him the funds. Salkicevic deposited money into her minor daughter's PayPal account. The minor daughter resided with

Salkicevic in Schiller Park, and funds were transferred from that account to a PayPal account in the name of Ramiz Hodzic (Sedina's email is listed on the account). A review of records revealed that by August 17, 2013, Salkicevic sent approximately \$1,500 this way. These funds were then transferred into a bank account in the name of Ramiz and Sedina at Southern Commercial Bank. According to subpoenaed records, two Paypal transfers in the amount of \$495.00 and \$1000.00 were deposited into Ramiz's Southern Commercial Bank account number xxxx8808 on August 19, 2013.

25. On August 12, 2013, Ramiz then made a series of purchases from Uncle Sam's Discount Camping and Military Surplus (Uncle Sam's) with multiple locations in St. Louis. According to subpoenaed records, Ramiz made a purchase in the amount of \$365.01 at Uncle Sam's. Funds were debited from Ramiz's Southern Commercial Bank account number xxxx8808 on August 12, 2013. It is unclear where Ramiz made additional purchases. Ramiz then sent a series of photographs of the purchased items to Pazara. The photographs depicted multiple sets of camouflage combat uniforms, tactical belts, goggles, gloves, pairs of tan or black combat boots, an optical scope and range finder and a ghillie suit. A ghillie suit is a heavily camouflaged, multilayered clothing item commonly worn by snipers. Ramiz told Pazara he should post a prayer to Salkicevic's Facebook account and thank Salkicevic for the \$1,500 donation so that the contributors could see it.

26. On or about August 15, 2013, in a post on Salkicevic's wall, Pazara thanked the sisters for the help (1500) and asks Allah, may He be Glorified and Exalted, to reward them with the highest level of paradise .

27. On or about August 19, 2013, Ramiz made additional purchases from Uncle Sam's. According to subpoenaed records, Ramiz made a purchase in the amount of \$173.02.

Funds were debited from Ramiz's Southern Commercial Bank account number xxxx8808 on August 19, 2013.

28. Also beginning in August 2013, Ramiz and Armin had a string of conversations concerning Pazara. Ramiz told Armin that the brothers were engaged in an offensive and would not be available for a few days. Ramiz also told Armin, that Armin answered the call immediately and that the brothers cried when they found out. Armin said it was their obligation. Ramiz told Armin that he sent the packages and that they contained binoculars, uniforms, gloves, boots and masks for the sand and that there are now 25 of "ours". Armin inquired when Hodzic would send again, as he would have something to give. Hodzic stated he would in two or three weeks.

29. United Postal Service records revealed on August 23, 2013, Ramiz shipped three packages from the Charles Coyle Post Office in St. Louis, Missouri. The records indicated they were shipped by Ramiz Hodzic, 4328 Chateau De Ville, St. Louis, Missouri. The packages were shipped to Nail Lukac, Istanbul, Turkey. According to the U.S. Postal service forms each package was valued at \$350 and contained clothing. The shipping fee for the packages was \$435.60. According to subpoenaed records, Ramiz paid for the shipping fees of \$435.60 utilizing his Southern Commercial debit card associated with checking account number xxxx8808.

30. On August 29, 2013, Ramiz then sent Pazara screen shots of the shipping information, as well as images of the three boxes he sent on August 23, 2013. One of the images depicted the brown cardboard boxes, wrapped in plastic wrap, in a home stored near a staircase. Two of the images depicted the brown cardboard boxes wrapped in plastic wrap with PAZARA written on them in black marker, in the rear of a SUV. Hodzic told Pazara that every box says *Pazara*.

31. Between September, 2013 and October, 2013, Pazara and Salkicevic continued to converse about raising more funds for Pazara and other brothers and obtaining equipment for them. Salkicevic then collected funds from her sources and arranged to send it via her minor daughter's PayPal account to Ramiz's PayPal account.

32. A review of business records obtained from Western Union records indicated that between September 17, 2013 and September 23, 2013, Hodzic sent \$850 to Nail Lukac in Istanbul, Turkey. These funds were then transferred onto Pazara and the brothers.

33. On or about September 17, 2013, Hodzic explained the breakdown of money Hodzic sent to Pazara. Hodzic told Pazara that \$500 was to go to the intermediary [presumably Nail Lukac] to cover his expenses and the brothers can cover theirs. Hodzic said the rest was for Pazara and the brothers. Hodzic indicated he would be sending an additional \$200 for Pazara to have when he went into the city.

34. On September 23, 2013, Ramiz and Armin conversed and Armin inquired if the brothers received the clothes. Ramiz states they got it and they are still in Turkey. Hodzic said he sent them money and they would be back on their way the next day. Hodzic said they still needed more money. Armin then told Ramiz to send \$1,500 to the brothers for him and that he would bring Ramiz the money later.

35. A review of business records obtained from Western Union indicated that on September 23, 2013, Hodzic sent \$1000 to Nail Lukac in Istanbul, Turkey. These funds were then transferred onto Pazara and the brothers.

36. A review of business records obtained from J.P. Morgan revealed on September 24, 2013, \$1,500 was transferred from a J.P. Morgan account in the name of Armin or Sanela Harcevic into Ramiz's Southern Commercial Bank account number xxxx8808. That same

day, Ramiz wrote a check for cash in the amount of \$1,000, likely to pay himself back for using his own funds to send the \$1000 to Nail Lukac the day prior.

37. On September 24, 2013, Salkicevic told Ramiz that she had a desire [to go] but could not without a chaperone. Based upon my training and experience, I know that she was referring to going to Syria as part of jihad. Ramiz told Salkicevic that she was more useful to them [the brothers] with 'that fight.' Salkicevic said she will do what is in her power. Ramiz told her that they had just sent them \$1850 and Salkicevic stated that is *what Allah wants!*

38. A query of US Postal Service tracking service website revealed the tracking numbers assigned to the packages sent by Hodzic on August 23, 2013 indicated that they all arrived in Turkey by September 25, 2013.

39. On September 27, 2013, Pazara told Ramiz that the brothers picked up the packages. Ramiz advised Pazara that he was preparing new packages to send him and would do so when Pazara sent him a new address.

40. On September 28, 2013, Ramiz told Salkicevic to keep their plans a secret and to not tell anyone because he had sent the money through *our connections*. Ramiz then stated that in addition to clothing and gear that they bought for the Bosnian brothers, they decided to buy them a pickup truck. The brothers *over there* can buy one for 5,000 and that they do not need much more, as they said they will not spend the money they already received from them. Ramiz told Salkicevic that no one besides them were sending anything to the Bosnian Mujahideen (fighters engaging in jihad).

41. On October 2, 2013, Pazara told Hodzic that he returned from the field that morning and the brothers arrived with everything. Pazara said they distributed everything and everything was fine. Pazara told Hodzic the night before, two of their Chechen brothers were



martyred. Hodzic asked Pazara to have the brothers get dressed [presumably in the new items Hodzic sent]. Pazara complimented Ramiz on the scope and asked for grey/brown boots, as they were better than the black ones for the terrain. Pazara also noted Ramiz should get used uniforms, as its all high quality.

42. On October 2, 2013, Ramiz conversed with Mirza Ganic (Ganic) about optics. Ganic was a Bosnian fighter who was with Pazara in Syria. Ganic stated that with better optics there is a bigger chance that he will kill in the name of God. Ramiz stated he was a sniper shooter for two years, has experience and Ganic should not worry about the quality. Ganic responded that it meant a lot to him that Hodzic is trying to help him in his fight against unbelievers. Ganic added that what Hodzic is doing is jihad as well and tells him to expect an award with which he will be pleased.

43. A FBI Online Covert Employee reviewed the Facebook page of Jasmin Jasarevic (Jasarevic), a foreign fighter who was fighting with Pazara. On October 3, 2013, Jasarevic posted an image to his wall of tan military boots, desert camouflage uniform and a green tactical belt. Atop of the image were the words *GIFT FROM THE USA*. Ramiz commented *I hope to Allah that it is of any kind of use for you [plural]*.

44. A FBI Online Covert Employee reviewed the Facebook of Sedina noted the following post made by Sedina on October 3, 2013: *...with Eid Mubarak getting closer, "we" are curiously wondering what we are going to get as a present*. Further, Sedina stated that *this morning she read a message from a brother [presumably Jasarevic] in Syria who received a small present from people who decided to share their wealth, given to them by Allah, with the brothers*. Sedina stated *it made her cry and stated that individuals who shared their money be blessed on this world and the next [afterlife]*. Sedina stated *to remember the brothers in Syria*

*and to think about how to make them happy during Eid Mubarak. Sedina also posted: for her and her dear sisters to organize themselves and to help the brothers. Sedina stated that whoever is able to help financially, to contact her via a message to her Inbox or to contact her husband Siki Ramiz Hodzic, Sadaka Teslic or Bosna Mexico. Sedina stated that whoever is not able to help financially to pray for those who battle so that Allah's word is supreme.*

45. On October 3, 2013, Pazara and Ramiz conversed and Pazara praised Armin as a real brother. Ramiz said he hadn't seen anyone fight financially more than Armin. Pazara and Ramiz discussed the money and the packages and Pazara confirmed that Nail got the money and everything was taken care of with him. Ramiz inquired about the usefulness of the sniper suit that was sent. Pazara told Ramiz that he shouldn't send anything to Nail anymore and that he had a new address and brother to receive money. Pazara identified the new brother as living near the border in Turkey. Pazara told Ramiz that they needed six more uniforms and boots and Ramiz agreed to send ten sets when he gets the new address. Ramiz told Pazara that Mirza wanted an optic too. Mirza is believed to be Mirza Ganic (Ganic). Ramiz told Pazara he would send Pazara optics so Pazara could hit them from 800 meters out. Pazara informed Ramiz that Syria was buzzing with mujahids and that there would be *big battles*, God willing and thanked Allah for allowing him to be one of his soldiers. Pazara stated he was preparing for action and that if he was martyred, he prayed that Allah would connect them in paradise. Ramiz told Pazara to post a picture or two [of them] with the uniforms on.

46. Ramiz then conversed with Salkicevic on October 3, 2013, and sent her a photograph of a subject in a camouflaged uniform and holding an assault rifle and standing in front of a burnt out truck. Salkicevic wanted to know how much it would cost for the gear in the picture and Ramiz told her it was between \$220 and \$240. That same day, Ramiz also conversed

with a subject identified as Raasit Yoruk (Yoruk). Yoruk claimed that he lived in Gaziantep, Nizip, Turkey. I know that based upon my training and experience as well as my investigation, Gaziantep is located near the border of Syria. Ramiz asked if he could send items to the brothers in Syria through Yoruk and Yoruk stated yes and it could be done.

47. On October 5, 2013, Ramiz sent a Facebook message to Sedina and it appeared to have been copied from a conversation with Pazara. The message read "Resit Cevik, Unaldi.sok.No:5Gazi.antemp, Turkiye, posta-Kod 27100, as well as a later message, Unaldi.Bozoklar Mah.5.Nolu.Sok.No:Gazi.Antep, Turkiye, posta-kod 27100.

48. October 5, 2013, Ganic posted an image to his Facebook page with the caption, *After morning training. May Allah grant us blessings with it ...Islamic State in Iraq and Sham.* The photo depicts seven men in a line (hereafter referred to as the *group photo*). The men were wearing tactical combat clothing and gear, mostly camouflage and armed with automatic and semi-automatic assault style weapons. Based upon my training and experience, the word *Sham* describes a region bordering the Eastern Mediterranean sea, known as the Levant and/or the region of Syria. Investigators compared the subjects in that photograph with public Facebook pages and on-line sources and photographs of known individuals. Agents were able to identify some of the subjects, including Mirza Ganic (Ganic), Jasmin Jasarevic, Ebu Malik es Sandzaki, Pazara, and Abu Hurejre Ruzic. Also based upon my training and experience, the nature of the photographs as well as the manner of dress and weaponry, the subjects in the photographs appear to be foreign fighters or insurgents.

49. On October 6, 2013, Ramiz used an image, appearing to be the same *group photo* posted by Ganic the day prior, as his current Facebook *Cover Photo*. I have compared the clothing and gear worn by the subjects in the group photo and they appear to be the same

clothing and gear depicted in the photograph of equipment and clothing that Ramiz had previously sent Pazara. The group photograph has been reposted and commented on in numerous Facebook pages. Salkicevic commented that she prayed that Allah would be pleased with them both in this world and in the hereafter.

50. Due to his close association with and overt support for Pazara and the brothers in Syria, an investigation began into Ramiz in mid-October 2013. Agents reviewed Ramiz's U.S. Citizenship and Immigration Services file. In that file, Ramiz declared that between 1993 and 1994, he had military service with the Bosnian Army and was on the "front lines".

51. Between October 6, 2013 and October 12, 2103, Salkicevic engaged in a series of financial transactions where by a total of \$1200.00 was transferred from a bank account in the name of Salkicevic's minor child, to the minor child's PayPal account and ultimately to Ramiz's PayPal account. These funds were then transferred from Ramiz's PayPal account to a bank account at Southern Commercial Bank in the name of Ramiz and Sedina. According to subpoenaed records, a Paypal transfer of \$1200.00 was deposited to was Ramiz's Southern Commercial Bank account number xxxx8808 on October 15, 2013. Ramiz then told Pazara that he received \$1,150 from "sadaka teslic." I know from my investigation that Sadaka Teslic is a Group Facebook page administered by Salkicevic.

52. On October 15, 2013, a check made payable to cash for \$300 was debited to Ramiz's Southern Commercial account and two withdrawals were made in the amounts of \$100 and \$502.50. Based upon my investigation and review of records, I know that Ramiz made a cash purchase on October 16, 2015 in the approximate amount of \$661.21 at Uncle Sam's, an Army Surplus store located in Manchester, MO. He purchased combat tactical boots, t-shirts, U.S. Army combat uniforms (with a digital camouflage pattern), socks and military style

backpacks. Ramiz traveled to another Uncle Sam's St. Louis, MO and made a second cash purchase for approximately \$464.06. This purchase included used combat boots, t-shirts, military "boonie" hats, tactical boots and battle dress uniforms.

53. On October 17, 2013, Ramiz sent Salkicevic a message that the packages would be shipped on Saturday and he would send her pictures. He told Salkicevic that he had talked to the brothers and that Pazara and the brothers had been in the field and had been in three actions in 10 days. I know that based upon my training and experience that "actions" refer to military actions or battles.

54. The investigation has revealed that on October 18, 2013, Ramiz went to Bass Pro Shop in St. Charles, MO and made a purchase in the amount of \$281.93. According to subpoenaed records, Ramiz made a purchase in the amount of \$281.93 at Bass Pro Shop. Funds were debited from Ramiz's Southern Commercial Bank checking account number xxxx8808 on October 21, 2013. The purchase was made with Ramiz's Southern Commercial Bank debit card and records indicate that he purchased two Pursuit long range rifle scopes and two weaver top mount rings (used to mount a scope to a rifle). It also appears on or about the same day, Ramiz made an additional purchase at the St. Peter's Uncle Sam's location in the amount of \$155.36 using the same debit card. Funds were debited for the \$155.36 purchase from Ramiz's Southern Commercial Bank account number xxxx8808 on October 21, 2013.

55. The investigation has revealed that on or about October 19, 2013, Ramiz made an additional purchase at Uncle Sam's in the amount of \$350.98 with the same debit card. Funds were debited for the \$350.98 purchase from Ramiz's Southern Commercial Bank account number xxxx8808 on October 21, 2013. The purchase included new and used U.S Army uniforms, a t-shirt and tan tactical boots. Thus, in a three day period, Ramiz purchased



approximately \$1913.54 of military uniforms, gear, scopes and equipment. In doing so, Ramiz went to several different Uncle Sam's locations which is consistent with one trying to avoid drawing attention to his purchases.

56. On October 19, 2013, Ramiz told the Salkicevic that he went shopping the past few days and added that as soon as it crossed the border, Salkicevic would receive all the pictures. Ramiz said this [shipment] was better than the last one. Ramiz sent Salkicevic a picture of the scopes. Salkicevic stated she couldn't wait for the brothers to receive it and put them to use. Ramiz told Salkicevic the brothers needed them urgently. Salkicevic asked if they would go on a rifle and Ramiz told her that it would, a sniper rifle.

57. On October 23, 2013, Sedina sent a Facebook message to Ramiz with the following information: Resit Cevik, Unaldi.Bozoklar Mah.S.Nolu. sok.No:5Gazi.Antep, turkiye, post-Kod 27100.

58. On October 23, 2013, Ramiz sent Pazara approximately 15 photographs via Facebook. The images included military uniforms, belts shoulder straps, a holster, a balaclava ( a cloth headgear that covers the face with only openings for the eyes and mouth), combat and tactical boots, tactical belts, rifle slings, shoulder harnesses, a tactical vest with magazine pouches, four rifle scopes, a Pentax illuminated scope and camouflage backpacks with accessories. The uniforms and equipment appeared to be consistent with most of Ramiz's known purchases at Uncle Sam's and Bass Pro Shop.

59. On October 24, 2013, Ramiz contacted Pazara and urgently asked Pazara to confirm the address, presumably the address where Ramiz was to send the packages. Ramiz then sent a Facebook message to Yoruk asking him to verify "the address". Yoruk responded with: Unaldi sok.No:5 Gaziantep, Turkiye 2700. Ramiz then provided the confirmed address to

Sedina.

60. On October 26, 2013, Yoruk sent Ramiz the following amended address: Unaldi Bozoklar Mah. Mehter Cad:5 nolu sok.no.5 Gaziantep, Turkiye, 27100. Ramiz expressed concern because he could not find the address on the internet but Yoruk maintained that this was the correct address. This address is very similar to the address that Ramiz had texted to Sedina on prior occasions.

61. Based upon my investigation, which includes a review of U.S. Postal Service records, I have learned that on October 28, 2013, Sedina shipped six packages from the Charles Coyle Post Office to the address in Gaziantep, Turkey. Four boxes were shipped to Raasit Yoruk and two boxes were shipped to Raasit Cevik at the same address. Based upon my investigation, Yoruk and Cevik are the same person. The USPS forms represented that the boxes were valued from \$200 to \$350 each and declared the items to be pants, shirts, shoes, jackets and backpacks. Of note, the scopes were not declared nor were the clothing items identified as military uniforms on the customs forms. Sedina paid approximately \$970.80 cash to ship the six packages. All of the packages were assigned tracking numbers and records reflect that they were received at the Charles Coyle Post Office on October 28, 2013 and then moved on to Chicago, Illinois.

62. On October 31, 2013, Ramiz told Yoruk that the packages were on their way and should be there in nine days. Ramiz said he would send Yoruk money and Yoruk agreed to let him know when the packages were received.

63. In early November, 2013, Ramiz conversed with Ganic and advised Ganic that the packages were in Turkey and that there were four optics, and one was for a Kalasa (short for Kalashnikov, a Russian style assault rifle). Hodzic stated two were long range and two were for up to 450 meters. Ramiz stated that one of the long range optics was for Ganic and the other for

Pazara. Ramiz said he promised one to Malik and Pazara could give the last to whom he pleased. Ramiz then sent Ganic photos of the uniforms and gear that was sent.

64. A query of US Postal Service tracking service website revealed the tracking numbers assigned to the packages sent by Sedina on October 28, 2013 indicated four of the six packages arrived in Turkey by November 8, 2013.

65. On November 11, 2013, Ramiz talked to Salkicevic and passed on greetings from the brothers. Salkicevic told Ramiz she would write to the brothers and see if the packages arrived in Turkey. Ramiz indicated the brothers will pick them up on that Friday. They also talked about future fund raising efforts. Salkicevic indicated if she does *it* again, she will do it next month, adding that she will not announce it on Facebook, rather visit the sisters door-to-door so there is no evidence left behind.

66. Between November 11, 2013 and November 18, 2013, Ramiz and Yoruk discussed the packages. Ramiz told Yoruk the packages were at the post office and for Yoruk to go to the Post Office as soon as possible to get them. Ramiz also told Yoruk that he would also receive \$2,000 for the Bosnian brothers in Syria. Yoruk told Ramiz he had not received anything yet and asked which company Hodzic used. Ramiz then sent six photographs to Yoruk depicting the six receipts for the packages that Sedina shipped. Yoruk told Ramiz that his name was Resit Cevik.

67. On November 23, 2013, Ramiz posted a photo to his Facebook page. The photo was captioned Ziki and depicted a minor male dressed in a beret and a camouflage military uniform. This image appears to be one of Ramiz's minor children. Pazara posted a comment on the image which essentially stated, a foreign fighter, "GOD WILLING".

68. On November 25, 2013, Ramiz told Yoruk that money had been wired to him and

Yoruk said that his brother went to get it. Western Union records indicate that the \$1,700 was received and collected in Gaziantep, Turkey.

69. On November 27, 2013, Yoruk advised Ramiz that he received the money, but that the authorities were investigating the packages in Turkey. On November 29, 2013, Yoruk stated he was told the packages only contained clothes but the Turkish authorities told him that there were electronic goods in the packages.

70. On December 5, 2013, Ramiz conversed with Jasarevic. Ramiz was uncertain if the packages would be delivered. Ramiz told Jasarevic that he had sent money to Pazara and he would tell Pazara to give \$200 to Jasarevic and that there was \$1,550 more for Pazara and the rest of the group. I know from my training and experience that any funds received by the brothers is valuable in Syria. The foreign fighters use these funds to purchase food, weapons and ammunition as well as pay for everyday living expenses.

71. Ramiz sent Salkicevic three photographs depicting three of the deceased foreign fighters, all clothed in camouflage. One image depicted a deceased fighter lying in the bed of a pickup truck. Pazara was in the photograph and was wearing a prayer cap and was placing his hand on the deceased forehead. Ramiz told Salkicevic to look at the deceased's boots. Based upon my review of this image of the boots posted by Ramiz on or about August 20, 2013, it appears that the deceased fighter is wearing the same style of boots that were sent by Ramiz to Turkey. A second deceased fighter was wearing a camouflage jacket and fingerless gloves. Ramiz directed Salkicevic to look at the gloves. Salkicevic replied, look at the fingers, Allah Akbar (translated as God is great). Based upon my review of the photographs of the gloves that Ramiz posted in August as well as the photograph of the second deceased fighter, it appears that the deceased fighter is wearing the same style of gloves that were sent over by Ramiz.

72. Salkicevic also informed Ramiz that she paid \$1,062 to Ramiz's PayPal account. PayPal records indicate \$1062.00 was transferred from Salkicevic to Ramiz on January 4, 2014.

73. On January 6, 2014, Ramiz talked to number of foreign Syrian based insurgents and foreign fighters and learned that a number of fighters were killed in early January, including Ganic. Ramiz also learned the brothers were destroying the enemy and that the brothers killed 30 enemy soldiers in one place the day before.

74. A review of business records obtained from PayPal indicate on January 17, 2014, Ramiz transferred the \$1000.00 Salkicevic sent to him via PayPal on January 4, 2014 to his Southern Commercial Bank account. Southern Commercial Bank records indicate a \$1000.00 PayPal transfer was deposited to Ramiz's checking account number XXXX8808 on January 21, 2014.

75. On January 18, 2014, Ramiz discussed his prior military experience with a Syrian-based foreign fighter. Ramiz informed the fighter that Ramiz had a new connection for sending optics to Turkey. Ramiz also discussed the fact he had 30 shell fragments in his body from the war (presumed to be from the prior Bosnian conflict). When Ramiz was told that a sniper position was for him (meaning Ramiz), Ramiz responded he never was in a trench and would not be in one now.

76. Approximately the same day, Ramiz also conversed with a subject known as Abu Khattab, seeking out a Turkey connection. Ramiz stated 30 complete uniforms and four optics, all valued at over \$8000, had already arrived in Turkey, but the Turk was afraid to pick them up.

77. On February 10, 2014, a package sent by Sedina to Raasit Cevik in Turkey was returned to the U.S. Post Office at 5636 Telegraph Road in St. Louis, Missouri. The package was missing the previously attached U.S. Customs form but did have a Turkish Customs form.



attached. The tracking number and other identifiers confirmed that package one was one of six previously sent by Sedina to Turkey.

78. The package had been significantly damaged at some point during the shipping process to and from Turkey. A visual observation by a Postal Inspector noted that the package contained camouflaged clothing and a rifle scope. This was visible through the holes in the package. On February 10, 2014, Ramiz attempted to pick up the package at the Post Office but the clerk was unable to locate it.

79. On February 10, 2014, the FBI was notified about the return of a package. On February 12, 2014, an additional package, also sent by Sedina to Turkey, was returned to the Post Office.

80. Due to Sedina's close association with and overt support for Pazara activities and his affiliates in Syria, an investigation began into Sedina in February 2014.

81. On February 12, 2014, the FBI then sought and obtained court authorized authority to search the packages. The FBI searched the two packages which contained the following:

a. The first package contained the following contents wrapped in a white plastic bag and clear plastic wrap on which the word "Abdulah" was written in black ink: AR/223 Bushnell rifle scope, AR/223 Optic Instruction manual, one pair of military load bearing harness/suspenders, combat shirts, combat pants, USMS boonie/jungle hats, one Desert combat jacket, one Fox tactical pistol holder, military belts, socks, under wear and bags of candy. The second package contained: 31 packages of gauze bandages; 18 headlamps with headbands, three pairs of army combat pants, three pairs of Desert army combat pants, one Battle Dress Uniform, four rifle slings, one Pentax illuminated rifle scope, one Tactical vest with a pistol holder and

three rifle magazine pouches and three pistol magazine pouches, t-shirts, Medical supplies, including ankle supports, disposable razors, ace bandages, waterproof tape, sterile pads, knee supports, wrist supports, boxes of gauze, vinyl examination gloves, anti-biotic cream, scar gel and burn cream, Desert combat boots.

82. On February 14, 2014, Ramiz went to the Post office, located at 5636 Telegraph Road in St. Louis, Missouri and picked up the two packages that had been sent by Sedina to Yoruk in Turkey and returned.

83. On February 20, 2014, Ramiz posted a photo to his Facebook page. The photo was of Ramiz holding a young boy and Ramiz was wearing a white t shirt bearing the word "ISIS" and holding his hand in the air displaying what is commonly known as the "Number One" sign. Based upon my training and experience the "ISIS" shirt and the gesture are indicative of Ramiz supporting the ISIS terror group.

84. On March 5, 2014, Ramiz asked Pazara why "we were retreating from cities" and why did they not have a connection for sending. Pazara told Ramiz that Amr Sham (one of his fighters) went to the border to pick up new brothers coming from Bosnia and Herzegovina. Pazara told Ramiz that Amr Sham would let him know about new connections. Ramiz then sent Pazara an image of himself in a military uniform and wearing a black tactical vest and asked Pazara if the uniform was good for him. Ramiz again asked Pazara to send him a connection for money immediately.

85. On March 7, 2014, Ramiz again told Pazara that with a new money connection there would be everything (meaning supplies and goods). He told Pazara that he had obtained a new telephone and camera for Pazara.

86. On March 10, 2014, the FBI searched the three additional packages that Sedina

had sent to Yoruk in Turkey on October 28, 2013, and had returned to the Post Office located at 5636 Telegraph Road in St. Louis, Missouri. The three packages contained the following: The first package contained: 4 camouflage pants, First aid supplies, black stocking caps, pair of tan combat boots, long-sleeved thermal shirts, 1 box of wrist and knee supports, 1 bag of hot chocolate packets, 1 black tactical vest with pistol holster, three rifle magazine pouches, three pistol magazine pouches and a black web belt, 1 pair of black: combat boots, 1 bag of respirator masks. The second package contained 2 Pursuit riflescopes, 1 Nikon-Buckmaster riflescope, 1 Nikon-Buckmaster riflescope instruction manual, 1 Nikon BDC Reticle instruction manual, 1 Bushnell binoculars instruction manual, a desert camouflage coat, a desert camouflage blouse, 2 pairs of tan combat boots, 2 black knit caps, 3 black balaclavas, 1 khaki balaclava, 2 desert camouflage short-sleeve shirts, 3 camouflage fleece jackets, 1 pack of black ankle socks. The third package contained: 2 desert camouflage "Specialty Defense Systems" model Molle II modular lightweight backpacks with 'US' stamps and frames.

87. On March 9, 2014, Ramiz and Pazara conversed. Pazara sent Ramiz hyperlinks to Amazon.com and ebay.com and requested boots, a waist pack and binoculars.

88. On March 10, 2014, Ramiz, an over the road truck driver was stopped at MacDill Airbase in Florida. He was making a commissary delivery. Base security officers talked to Ramiz and obtained Ramiz's consent to search his cell phone. Security officers observed numerous images on Ramiz's phone including Ramiz in a U.S. military uniform and wearing a tactical vest, an image of a ziplock bag containing tubes of scar treatment ointment, images of six rifle scopes, an image of a large box of military uniforms and equipment and an image of U.S. Postal Service labels from Sedina Hodzic to Raasit Cevik in Turkey. Ramiz told the base security that, he purchased 10 sets of military uniforms and sent them to his brother for "paintball" and

that he purchased the scopes for his brother so that his brother could sell the scopes in Bosnia.

89. On March 20, 2014, Pazara conversed with Zepcanin and Pazara told Zepcanin that they had just returned from a three day mission where they captured a large area, killed eleven individuals and captured one. Pazara stated that they intended to "slaughter" the prisoner the following day, after prayers.

90. On March 27, 2014 Ramiz conversed with Nihad Rosic and Mujo Rahic (Rahic). Ramiz said that prior to sending this last group of packages to the man, all was good. He stated he sent \$2,500 and six packages to the man but he didn't pick them up. Ramiz stated that he sent the brothers 50 uniforms, six optics, a distance meter and 50 pairs of boots. Ramiz stated when the packages left here there were no problems but when they were sent back, there were problems. Ramiz claimed that the optics were the cause of the problems. Ramiz claimed he would *forgive* a five year jail sentence, just as long as the items were picked up. Ramiz claimed that the binoculars he sent in the first mailings saved them 100 times as they can uncover sniper shooters. He stated he now sends them money and takes a picture of the receipt.

91. On March 28, 2014, the FBI searched the last of the six packages Sedina had sent to Yoruk in Turkey on October 28, 2013 and had returned to the Post Office located at 5636 Telegraph Road in St. Louis, Missouri. The package contained the following: 1 Pursuit rifle and muzzleloader scope instruction manual and cleaning cloth, 2 pairs of Weaver top mount scope rings, 1 pair of Millet scope rings, 1 small allen wrench, 1 desert camouflage coat, 2 pairs of black Nike hard shell knee pads, 1 desert camouflage long-sleeve thermal, 3 black stocking caps, 2 camouflage facemasks, 1 camouflage short -sleeve shirt, 1 camouflage long-sleeve shirt, 1 pair of UV 400 goggles with an Uncle Sam's price tag of \$26.99 affixed, 1 pair of black combat boots, 1 pair of tan combat boots, various chocolates and gum, 1 pair of Nike running shoes, 1

bag of black ankle socks, 5 small/pocket-size Qurans in zippered cases - two blue, two brown and one green, 5 medium/travel-size Qurans in zippered cases - two green, two black and one burgundy and 1 camouflage soft-shell backpack.

92. On March 28, 2014, agents determined through court ordered intercepts that Ramiz and Rosic conversed about Bosnian martyrs and Ramiz states that "they" were all together as a special forces. Ramiz told Rosic that people over there do not hide anything from him as he (Ramiz) is friends with them and they consider Ramiz one of them. Ramiz told Rosic that things were easier now that there were weapons and everything and 80% of the Bosnians were in one unit. He claimed that 150 Bosnians and approximately 400 to 500 fighters from Bosnia, Sandzak and Montenegro were together. Rosic claimed that they were all "our people".

93. Ramiz told Rosic that when he started, he promised the brothers he would buy them things and when no one stepped forward, Ramiz told his wife (Sedina) and they decided to give what they had. He stated that he told his wife that she should be ready for him to go to jail if anything happened. Ramiz stated his wife told him to give. Ramiz told Rosic that he expected to be arrested, but when he saw them battling in slippers, he would send them materials, even if he got a year for each uniform. Ramiz told Rosic that the fighters had enough weapons and had seized a warehouse and that the brothers had to buy their own snipers (rifle). He claimed that the job five snipers could do, couldn't be done by 100 other people.

94. Ramiz stated that Pazara was advancing and was a substitute for the *Emir*. He told Rosic that women in Chicago had helped and collected and sent \$1,300 in one month and \$1,000 in another, but no longer wanted problems.

95. On April 1, 2014, Ramiz and Rosic conversed and Ramiz told Rosic that a married sister in St. Louis wanted to go "there" and a married couple in Chicago had gone



"there". Rosic then told Ramiz to send \$500 for him and that Rosic would send Ramiz the \$500 to him when he got to a truck stop.

96. Sedina was later told that packages were returned and waiting for her at the Post Office located at 5636 Telegraph Road, St. Louis, Missouri 63129. Agents observed Sedina and another female subject drive to the Post Office in her red Ford Explorer and enter the Post Office. Sedina placed the four packages into the rear of her Explorer. Based upon court authorized surveillance, agents determined that Sedina took pictures of the boxes in her truck. Sedina then sent the image of the four packages to Ramiz. Based upon court authorized intercepts, agents learned that Sedina talked to Ramiz and told Ramiz that she and Amra went and all four (boxes) arrived. Ramiz told her that they needed to be repackaged and taken out of the house. Sedina then asked if Ramiz would send the packages to Bosnia.

97. Later that day, agents observed Sedina and Ramiz drive to Wal-Mart, where they purchased two large blue plastic storage bins. They returned home and unloaded the bins along with the four returned packages and took them into their residence at 4328 Chateau De Ville, St. Louis, MO.

98. On April 4, 2014, Ramiz conversed with Amr Sham and sent him some images. One image depicted combat boots, uniforms, optics and other military equipment packed in two large blue bins and located in what appears to be a residential bathroom. Based on the investigation, the two large blue bins in the picture sent to Amr Sham appear to be the same blue bins purchased the day prior at Wal-Mart.

99. Agents determined though a court authorized intercept that on April 9, 2014, Ramiz and Rosic conversed and discussed Ramiz sending Rosic videos of combat in Syria. Ramiz told Rosic that he got a call to help a woman in Zenica, but told the person that he was not

a humanitarian organization. Ramiz stated that he only helps the brothers and women and children of the brothers who are fighting.

100. On April 16, 2014 Ramiz conversed with Islam Isko Dubravac on Facebook, who stated that he (Ramiz) might be able to get land in Bosnia for free as he was "Golden Lily". I know that based upon my training and experience that the "Golden Lily" is a significant Bosnian military medal awarded to the bravest soldiers. Throughout the investigation, Ramiz used his military training and experience with weapons to guide and assist Pazara and the brothers in Syria.

101. On April 23, 2014, Ramiz sent Rosic photos of camouflage military gear and scopes, and told him to choose what he wanted. Rosic said that he wanted to visit the brothers in New York and would go to the army store. Rosic stated that a sniper needed a good monocular and he would buy one. Rosic stated he was working out and was in good shape.

102. On April 25, 2014, Ramiz and Rosic conversed and discussed how Rosic could get weapons and military gear. Rosic told Ramiz about his proficiency with a rifle and that he still has a "sniper" that he legally bought and used to hunt. He stated that he could hit a quarter from 100 meters. Ramiz also talked to Rosic about the importance of reconnoitering enemy positions.

103. On or about May 5, 2014, Ramiz and Rosic conversed about meeting up and about Ramiz having equipment and arranging to send more packages.

104. On May 7, 2014 Ramiz conversed with Rosic and told Rosic not to buy boots as he would ship them to him in Bosnia. He also instructed Rosic to come by the house when he is in St. Louis because they would see what fits Rosic.

105. On May 7, 2014, Pazara posted seven images to his Facebook page. The images

depicted deceased individuals and fighters.

106. On May 10, 2014, Rosic conversed with Pazara and Rosic told he would be departing for Bosnia on the 20th. Rosic said he would bring a few lions with him from Bosnia. Rosic said he couldn't wait to get on the plane on the 20th. Pazara told Rosic he prayed to Allah constantly that the two of them would be united. Rosic asked if Pazara would be able to pick him up in Turkey or if they would just see each other over there. Pazara said if it was possible, he would go get Rosic, but if not, it would be other brother and Rosic didn't need to worry. Rosic said he couldn't wait to confront the enemy. Pazara asked Rosic if he'd seen the picture where Abdullah and others had killed many of them in the last few military actions, to which Rosic confirmed he did. Rosic said one brother that was supposed to come with him had a good amount of experience.

107. Agents determined though a court authorized intercept that on May 15, 2014, Ramiz conversed with Rosic and told him he would show him everything when he came to St. Louis. Ramiz told Rosic that there were five different types of real rifles in St. Louis and that Rosic needed to be trained. Ramiz discussed his war experiences and told Rosic that there was a brother in St. Louis with two semi-automatic rifles. Ramiz told Rosic he was going to purchase three watches for Pazara before Rosic went to Bosnia.

108. On May 16, 2014, Ramiz conversed with Armin and asked if Ramiz sent money on his behalf and Ramiz confirmed that he did so.

109. On June 11, 2014, Ramiz posted an image to his Facebook page. The image was of a certificate stating that Ramiz Hodzic...has been designated a "Golden Lily".

110. On June 13, 2014 Ramiz conversed with Pazara and Ramiz gave Pazara directions on how to make a cheap silencer for "quiet liquidations".

111. On June 16, 2014 Pazara posted nine images to his Facebook page. One image depicted Pazara and another man in camouflage clothing standing in front of an armored Humvee vehicle and Pazara had an assault weapon. Other photos depicted two tanks. The captions read *Ganima from Mosul, Iraq arrived. American Infidel Hummers, and Allah supplied the Bosnian mujadin (sic) of Sham*. I am informed that that *ganima* is a Bosnian translation for the English word *booty*.

112. On June 22, 2014, Ramiz conversed with Amr Sham and they discussed Ramiz sending watches, a laser, shoes, optics, uniforms and winter equipment for the fighters to a Turkish address.

113. On June 26, 2014, Pazara updated his "status" on his Facebook Page. Under "status", Pazara stated: *We are Terrorists because terror is (intimidation of enemies), our requirement outlined in Allah's Book. So that the east and the west know that we are TERRORISTS and that they need to fear us! I Exalted Allah said in the Qur 'an: prepare against them as much force as you can and horses for battle so that you can, with it, terrorize yours and Allah's enemies.*

114. In early July, Ramiz posted an image to his Facebook page. The image depicts a face and a written quote which states *...we will never give up. Either we will win or we will die. Ours will engage in war with generations that will come after us. As far as I am concerned, I will live longer than the criminals.*

115. On July 7, 2014, Armin and Ramiz talked to each other. Through Court ordered intercepts agents determined that Armin told Ramiz that he has six or seven pairs of shoes and socks for Ramiz and that these come from Haris.

116. On July 25, 2014, Ramiz posted a photograph of himself standing inside of a store

wearing at-shirt that says; *My name is Siki Ramiz Hodzic and I #SupportGaza*. Hodzic is displaying the number one sign with his right hand.

117. On July 31, 2014, Sedina and Ramiz conversed and talked about the cost of an apartment in Sarajevo and talked about papers and passports.

118. On September 12, 2014, Agents, using court authorized intercepts, determined that Ramiz conversed with Amr Sham who advised Ramiz that Pazara purchased a 16 year old Iraqi girl as a slave.

119. Agents also determined through court authorized intercepts that Ramiz then had a conversation with Amir Huskic. Ramiz told Huskic that Pazara bought a female slave and that he (Pazara) had the right to *sleep* with the slave.

120. On September 20, 2014, through court authorized intercepts, agents determined that Ramiz had a conversation with Delic. Ramiz told Delic that Pazara became a martyr. Ramiz stated that the infidels had killed Pazara by airplane.

121. Ramiz proceeded to call numerous associates and detailed Pazara's death. On September 21, 2014, Ramiz and Salkicevic conversed and Ramiz advised Salkicevic that Abdullah (Pazara) was martyred that afternoon. Salkicevic prayed that Allah would grant Pazara the best place in the company of the prophet and accepts him as a martyr. Ramiz and Salkicevic had another conversation where Ramiz prayed that Allah accepts his martyrdom and for him to mention *us* in paradise. Salkicevic said that she talked to him (Pazara) once about the donations and he told her that if he ever got *there* (paradise) that he would mention us.

122. Salkicevic proceeded to post an image of Pazara to her Facebook page. Pazara was wearing a camouflage top and holding an assault rifle while displaying the *number one* sign with the other hand.



123. On October 14, 2014, agents determined through a court authorized intercept that Ramiz, talked to Rosic and Rosic stated that he wanted to send some money *there*. Hodzic stated that his wife collected \$350 and that he and his wife will donate money, too. Rosic asked Ramiz to donate \$150 on Rosic's behalf and said he would get it to Ramiz tomorrow.

124. Agents determined through a court authorized intercept that on October 23, 2014, Ramiz talked to Sedina. Ramiz told Sedina that the Jasarevic's brother told him that the FBI talked to Jasarevic about Ramiz. Ramiz said *they* (the FBI) were forcing *Him* (Jasarevic) to lie. Sedina stated that money needed to be saved up so that they could leave.

125. On October 24, 2014, Ramiz and Salkicevic conversed. Salkicevic asked if there were pictures of Pazara.

126. On November 1, 2014, Ramiz updated his Facebook status and stated *Ziki (his son Ziyad) wants a toy*. Ramiz then posted a photograph of himself in a gun shop holding some unknown type of rifle with an attached scope. Ramiz noted that *I do not need a license for this, except in Bosnia*.

127. On November 6, 2014, Ramiz posted an additional photo to his Facebook page. The photo depicts Ramiz sitting in a chair and holding what appears to be a semi-automatic pistol and a rifle with a scope on it. The caption read *Toys for the young haahah*.

128. On November 5, 2014, Ramiz posted a photo to his Facebook page. The image depicted an open laptop computer on its side on top of a towel. The caption read that *Sedina is drying off the computer. Ali got it wet. He was thirsty so he poured Red Bull on the keyboard*. Siki is believed to be one of Ramiz and Sedina's minor children.

129. On December 4, 2014, Ramiz posted another photo to his Facebook page. The photo depicted Ramiz sitting on a floor in a residence and he is holding what appears to be two

semi-automatic pistols. Ramiz titled the photo *One with the brothers*. Samir Hatkic asked Ramiz if they were real and Ramiz said that they were.

130. On December 21, 2014, Ramiz posted another photo to his Facebook page. The photo is captioned: *Something from the archives* and depicted three armed young men in camouflage.

131. On January 6, 2015, Ramiz posted another image. The image depicted a younger Ramiz in a wooded and snowy area and clad in an all-white camouflage uniform and holding a rocket propelled grenade launcher (RPG). Ramiz talked about his war experience which included firing an RPG at *Chetniks*.

132. Based upon this investigation, as well as my training and experience and the training and experience of other agents and investigators that are working on this case, I know the following to be true: that individuals who collect funds to support insurgents and foreign fighters, use various methods to raise, collect and receive and send funds. These methods include the use of Western Union, PayPal, wire transfers and cash drops. Almost all of the methods generate records and receipts in paper, digital or electronic formats. I further know that these individuals typically keep and retain these records so that they can keep track of incoming donations and so that they can pay appropriate tribute to the donors in person, on-line and as we has been seen in this case Facebook tributes. Further that after the funds are received, some of them are used, as in this case to purchase military uniforms, military equipment, and related items. In the case of the purchase of these items, records and receipts are generated in paper, digital and electronic formats. These records include receipts, debit and credit card receipts, and bank statements referencing checking account debits. These individuals also keep and retain these records in order to document purchases and track their expenditures. These individuals

often keep and retain ledgers and records to assist in tracking incoming funds, the source of the funds, outgoing purchases as well as the recipients of the purchased goods. I also know that individuals, who support the foreign fighters and insurgents typically collect, review and retain propaganda materials in paper, digital and electronic formats. These materials include: pamphlets, posters, photos, images, videos, articles, blogs, Facebook, and email postings.

133. I further know that Individuals who support foreign fighters and insurgents typically keep and retain war memorabilia and souvenirs such as patches, insignias, hats, articles of military clothing and weapons. A review of Ramiz's most recent Facebook postings document the possession of weapons as well as other memorabilia.

134. I further know that Ramiz and Sedina obtained and packaged and shipped large quantities of military uniforms and military gear, including boots, backpacks, holsters, scopes, range finders, tactical vests, first aid supplies, rifle slings as well as other items. I further know that several packages were shipped via the U.S. Postal Service to Turkey for transshipment to Syria. These packages were examined by Turkish Customs officials. Presumably Turkish authorities observed the scopes and returned the packages to the United States. Sedina Hodzic was observed retrieving four of these packages from the Post Office and returning with them to Chateau De Ville. Agents then observed Ramiz and Sedina transport these packages to a local Wal-Mart store where they purchased two large blue plastic covered bins. Ramiz and Sedina then returned to the Chateau de Ville with the packages and the bins. I know that agents maintained periodic surveillance on the Chateau de Ville residence. Agents also set up a covert pole camera that maintained digital video surveillance of Chateau de Ville. Agents conducting physical surveillance did not observe the returned packages, their contents or the blue bins being removed from Chateau de Ville. Agents also conducted a review of the pole camera recordings

and didn't observe the removal of the packages, the contents or the blue bins. Further, due to the expense and the significance of the purchased goods, I believe that these have been retained for future use.

135. On February 6, 2015, Sedina Hodzic was arrested in St. Louis, Missouri based upon an arrest warrant issued under :15 CR 00049 CDP DDN. Subsequent to the arrest, Sedina was interviewed by Agents of the FBI. During the interview, Sedina told agents the boxes she shipped containing military uniforms, gear and equipment to Turkey were all returned back to Ramiz and her in St. Louis. Once they received the boxes back, they repackaged them and took them over the home of Mirajeta Hatic. Hatic stored them in her basement. Sedina noted in the interview that the returned contents were repackaged into blue plastic boxes/bins, which they then wrapped in plastic wrap. Sedina added that Hatic was unaware of the contents of the bins. Sedina then provided written consent to interviewing agents allowing consent to search *blue boxes* located at *Mirajeta Hatic's* residence.

136. On February 6, 2015, Agents went to the home of Mirajeta Hatic, located at 1959 Fox Pointe Drive, St. Louis, MO. Upon discussion with Hatic and disclosure of Sedina's written consent form regarding the blue boxes, Hatic walked agents into her basement. Hatic explained that on two occasions, the Hodzic's brought over several plastic bins for storage in her basement. Hatic indicated two grey plastic bins and three blue bins, all wrapped in plastic wrap belonged to the Hodzic's. There was one additional blue bin, with no lid, containing dolls, that also belonged to the Hodzic's. Hatic claimed to be unaware of the contents of the boxes. Hatic then provided written consent to Agents to search the grey bins located in her basement storage area. Agents then seized a total of three blue bins and two grey bins, each wrapped and sealed in plastic wrap from Hatic. The plastic bins are described as follows: (2) blue in color, Rubbermaid Roughneck

50 gallon plastic bins, (2) grey in color, Sterilite 50 gallon plastic bins, and (1) blue, Sterilite 35 gallon plastic bin. The aforementioned bins were then conveyed to the St. Louis Field office address and placed in evidence for safe keeping. In abundance of caution, agents seek this search warrant.

137. Based upon my affidavit, and the fact that a Federal Grand Jury in this District has found probable cause that violations of Title 18, U.S.C. §§2339A and 956 have occurred and that Ramiz committed these violations and Sedina committed the violation of Title 18 U.S.C. §2339A and probable cause exists to believe that the items included in Attachment A will be found (2) blue in color, Rubbermaid Roughneck 50 gallon plastic bins, (2) grey in color, Sterilite 50 gallon plastic bins, and (1) blue, Sterilite 35 gallon plastic bin.

REQUEST FOR SEALING

138. It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the application and search warrant. I believe that sealing this document is necessary because the items and information to be seized are relevant to an ongoing investigation into the criminal organizations as not all of the targets of this investigation will be searched at this time. Based upon my training and experience, I have learned that online criminals actively search for criminal affidavits and search warrants via the Internet, and disseminate them to other online criminals as they deem appropriate, i.e., post them publicly online through the carding forums. Premature disclosure of the contents of this affidavit and related documents may have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness.



**ATTACHMENT A**

*Property to be seized*

1. Military surplus equipment and gear, to include but not limited to camouflage clothing, United States military uniforms, foreign military uniforms, military styled clothing, boots, socks, backpacks, belts, goggles, hats, coats and any other military styled gear;
2. All records relating to violations of Title 18, United States Code, Sections 2339A, and 956, those violations involving Ramiz Zihad Hodzic, Sedina Unkcic Hodzic, Mediha Medy Salvicevic, Armin Harcivic, Nihad Rosic, Jasminka Ramic and Abdullah Ramo Pazara, a/k/a Abdullah al Amriki and occurring after May, 2013, including:
  - a. All financial records and documents, to include but not limited to bank statements, deposit slips, checkbooks, credit cards, debit cards, deposit slips, credit card statements, Western Union, PayPal or any other electronic funds transfer records;
  - b. Photographs, images or recordings in any form, including images of the subjects identified in the affidavit and images or recordings of these subjects holding or displaying firearms or weapons or wearing military styled uniforms and military surplus items;
  - c. Photographs, images or recordings in any form of fighters, foreign fighters, insurgents, and/or combatants;
  - d. All weapons to include but not limited to rifles, pistols, revolvers, bayonets and other bladed weapons;
  - e. Ammunition and firearms accessories to include but not limited to slings, scopes, rangefinders, sighting systems, shooting gloves, bullet proof and tactical vests, guns stock, clips and magazines ;

- f. Receipts for purchases of any military gear, weapons or clothing;
- g. Any correspondence in whatever form(s);
- h. All material to include but not limited to pamphlets, articles, letters, images, videos, books, placards, clothing that refer to ISIS, (a/k/a IDIS)AQI, ISIL or the Islamic State;
- i. All materials to include but not limited to pamphlets, articles, letters, images, videos,